


OGC HAS REVIEWED.

25X1A

MEMORANDUM OF NOTES - 

1. The situation seems to be this. Both income from employment by a U.S. concern or from shares in a U.S. concern is considered income from possessions outside the U.K. In the case of the former, if the remuneration is payable outside the U.K. in accordance with the contract, or possibly if only repayable outside the U.K. as a matter of convenience, the income is on a remittance basis and hence there is no tax liability. Income from the shares however is on an "arising" basis and liability exists no matter where the income is remitted. All this under Schedule D, Case V.

2. Schedule E excludes from it income chargeable under Schedule D, Case V.